

1 W. Gregory Lockwood, WSBA #52232  
2 Gordon & Rees, LLP  
3 1300 SW Fifth Ave., Suite 2000  
4 Portland, OR 97201  
5 Phone: (503) 382-3855  
6 Fax: (503) 616-3600  
7 [wglockwood@grsm.com](mailto:wglockwood@grsm.com)  
8 *Attorneys for Defendant Life Flight Network*

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF WASHINGTON

11 JOHN KRILL,

12 Plaintiff,

13 v.

14 LIFE FLIGHT NETWORK LLC and JOHN  
15 DOE EMPLOYEES I – V of LIFE FLIGHT  
16 NETWORK, LLC

17 Defendants,

Case No. 2:22-cv-00057

**DECLARATION OF W. GREGORY  
LOCKWOOD IN SUPPORT OF NOTICE  
OF REMOVAL**

18 I, W. Gregory Lockwood declare under penalty of perjury that the foregoing is true and  
19 correct:

20 1. I am the attorney of record for Life Flight Network LLC (“Life Flight”) in this  
21 matter. I make this declaration in support of Life Flight’s notice of removal.

22 2. Based on my investigation and information obtained in pre-litigation matters in  
23 this case, Mr. Krill is a citizen of the State of Wyoming, residing in Jackson, Teton County. This  
24 belief is partially based upon a Westlaw Public Records PeopleMap Search, which could be  
25

1 provided to the Court, but has been omitted because of the larger amount of personal information  
2 included in it.

3 3. Based on my experience as a lawyer, claims like Mr. Krill's, based on alleged  
4 permanent disability exceed \$75,000 in value.

5 4. Past and future medical expense alone could account for more than \$75,000.00 in  
6 claimed damages.

7 5. Based on the types of damages alleged, Plaintiff's claims exceed the threshold for  
8 diversity jurisdiction.

9  
10 **I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE**  
11 **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE**  
12 **FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR**  
13 **PERJURY.**  
14

15  
16 Executed on: April 4, 2022

GORDON REES SCULLY MANSUKHANI, LLP

17 By: s/ W. Gregory Lockwood  
18 W. Gregory Lockwood, WSBA No. 52232  
19 [wglockwood@grsm.com](mailto:wglockwood@grsm.com)  
20 Attorneys for Life Flight Network LLC  
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